EXHIBIT 119

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as President of the United States; U.S. DEPARTMENT OF HOMELAND SECURITY; ELAINE C. DUKE, in her official capacity; U.S. CITIZENSHIP AND IMMIGRATION SERVICES; U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; and the UNITED STATES OF AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228 (NGG) (JO)

DECLARATION OF JACOB TINGENS

Pursuant to 28 U.S.C. § 1746(2), I, Jacob Tingen, declare as follows:

- 1. I am over the age of eighteen. I have personal knowledge of the matters stated herein, and if called as a witness, I could and would testify competently thereto.
- 2. I am a managing partner of Tingen & Williams, PLLC, a law firm located in Richmond, Virginia. Our practice areas include immigration, criminal defense, family law, personal injury, and business law. Our employees and clients are extraordinarily diverse by any measure, including in country of origin, language, culture, race, ethnicity, religion, geography, family income, age, and educational background.
- 3. Tingen & Williams currently employees eleven employees.
- 4. Tingen & Williams employs one employee, G.L., who is a recipient of the Deferred Action of Childhood Arrivals ("DACA") program. G.L. is employed as the Receptionist of the law firm. As a receptionist, her duties include:
 - a. Answering the phone,
 - b. Customer Service.
 - c. Handling incoming and outgoing mail,
 - d. Preparing immigration forms,
 - e. Contacting and coordinating with courts,
 - f. Contacting clients,
 - g. Collecting payment,
 - h. Managing calendars and attorney appointments,
 - i. And more.

- 5. Because of our diverse clientele, our law firm requires staff like G.L. who has the capability to speak both English and Spanish. It is always difficult for us to find high-quality employees like G.L. who are bilingual and who are capable of learning what we need in our law office in terms of professionalism, use of technology, and the day-to-day tasks of our office. For that reason, we are grateful to employ G.L. as our Receptionist.
- 6. Tingen & Williams spends significant time and resources to recruit, hire, train, and supervise employees. When any employee departs, it creates disruption for our law firm and costs us time and resources to replace and train a new employee. Failure to retain a qualified Receptionist to manage this law firm puts the timeliness of court deadlines and the firm's ability to successfully perform its critical day-to-day work at risk.
- 7. The termination of DACA will be disruptive to our firm's operations and cause us to expend additional resources.

Jacob Tingens

Executed on: September 27, 2017